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I am concerned that the BMP for Aggregate Production Operations are inadequately specific in detailing any metric for when sediment and erosion control facilities are adequate. They merely indicate that certain control facilities "can" be provided. It should specify that the sediment and erosion facilities should be adequate to prevent release of sediment contaminants including management of runoff during a 10-year frequency event.

Most of these operations are within flood prone areas and are expected to incur higher frequency of flooding. The impact of these operations potentially reducing available stormwater surge area should also be addressed.

Other regulated operations are required, by enforcement to remediate any offsite impacts from excessive releases. These sand mining operations have not been required to mitigate the excessive sediment releases in previous flooding events. If they were held financially accountable then they would have greater incentive to invest in better preventive controls.